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APPLE INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

Aylus Networks, Inc.,
Plaintiff,

vs.

Apple Inc.

Defendant.

CASE NO. 3:13-cv-4700-EMC

**JOINT STIPULATION AND ~~[PROPOSED]~~
ORDER REGARDING AUTHENTICITY
OF DOCUMENTS**

1 WHEREAS, Aylus Networks, Inc. (“Aylus”) commenced the above-captioned action (the
2 “Litigation”) against Apple Inc. (“Apple,” and together with Aylus, “the Parties,” and individually
3 each a “Party”) on October 9, 2013;

4 WHEREAS, the Parties subsequently have produced thousands of pages of documents in
5 connection with discovery in the Litigation; and

6
7 WHEREAS, the Parties have determined that it is in their mutual interest to avoid the
8 significant and unnecessary burden and expense associated with the document-by-document
9 authentication of documents, and that stipulating to the authenticity of certain documents will
10 promote the orderly and efficient progress of the Litigation.

11 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the Parties as
12 follows:

13
14 1. Absent affirmative evidence that a document or thing is not what it purports to be,
15 the Parties agree that documents produced by either Apple or Aylus in the Litigation will be
16 presumed authentic for purposes of Rule 901 of the Federal Rules of Evidence.

17 2. The Parties agree that, absent affirmative evidence to the contrary, documents
18 produced from the records of either Party are presumptively business records for purposes of Rule
19 902(11).

20 3. Nothing in this stipulation shall be construed as an agreement that any documents
21 or things that are subject to this stipulation are admissible into evidence by any Party, except as
22 expressly addressed herein. The Parties hereby expressly reserve the right to object to the
23 admissibility of any document or thing under any grounds permitted by law and not expressly
24 addressed herein.
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26
27
28

1 Dated: July 17, 2015

2 QUINN EMANUEL URQUHART &
3 SULLIVAN, LLP

DLA PIPER LLP (US)

4 /s/ Amar L. Thakur

/s/ Christine K. Corbett

5 Harold A. Barza
6 Amar L. Thakur
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8 Attorneys for Plaintiff,
Aylus Networks, Inc.

9 Attorneys for Defendant,
10 Apple Inc.

ATTESTATION CLAUSE

I, Joseph B. Martin, am the ECF User whose identification and password are being used to file this Stipulated Protective Order. In compliance with Civil Rule 5-1(i)(3), I hereby attest that Christine K. Corbett and Amar L. Thakur have concurred in this filing.

Dated: July 17, 2015

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

By: /s/ Joseph B. Martin

Joseph B. Martin
Attorneys for Plaintiff,
Aylus Networks, Inc

1 **[~~PROPOSED~~] ORDER**

2 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

3
4
5 Dated: 7/17/15

By: _____

